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Attorneys for Defendant Ocwen Loan Servicing, LLC

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

LINDA GATSON, an individual,

Plaintiff,

vs.

OCWEN LOAN SERVICING, LLC; and  
Does 1 through 100, inclusive;

Defendants.

Case No: 3:14-CV-04161-JST

**STIPULATION TO EXTEND FACT  
DISCOVERY CUT-OFF DATE;  
PROPOSED ORDER**

Complaint Filed: September 15, 2014  
Trial Date: April 4, 2016

**RECITALS**

Plaintiff LINDA GATSON and Defendant OCWEN LOAN SERVICING, LLC  
(collectively, the "Parties") by and through their respective counsel of record, and subject to the  
Court's approval, hereby stipulate and agree as follows:

WHEREAS, the Court referred this case to mediation, and a mediation before appointed  
mediator, Gilda R. Turitz is scheduled to proceed on September 29, 2015;

WHEREAS the parties have been and will continue to discuss and attempt to negotiate a  
possible settlement of this matter up to and through the date of the scheduled mediation;

WHEREAS, Defendant intends to depose Plaintiff, who is elderly, and in order to avoid  
the costs and imposition of a deposition if this matter should settle by the September 29, 2015  
mediation, the Parties agree that it is the best interest of the Parties to continue the current fact  
discovery cut-off deadline of October 2, 2015 until November 6, 2015, which will allow  
Defendants to depose Plaintiff after the mediation if the case remains unresolved;

WHEREAS, the Parties agree that an extension of the fact discovery cut-off date would  
allow the Parties to facilitate a possible resolution of this dispute while at the same time save  
time and resources associated with preparation for, travel to, and attendance at Plaintiff's  
deposition; and

WHEREAS, the extension of the fact discovery cut-off date from October 2, 2015 to  
November 6, 2015 is not requested for purposes of delay and will not result in any prejudice.

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**STIPULATION**

IT IS THEREFORE STIPULATION AND AGREED, by and among the Parties, and subject to the approval of the Court, that:

1. The fact discovery cut-off date in this matter be extended to November 6, 2015.

Respectfully Submitted,

DATED: September 3, 2015

**MELLEN LAW FIRM**

/s/ Sarah Shapero

Sarah Shapero  
Attorneys for Plaintiff  
Linda Gatson

DATED: September 3, 2015

**HOUSER & ALLISON**

/s/ Jason K. Boss

Jason K. Boss  
Attorneys for Defendant  
Ocwen Loan Servicing, LLC

**PROPOSED ORDER**

Having reviewed the above stipulation of the Parties and good cause appearing therefore, IT  
IS SO ORDERED.

DATED: September 3, 2015

